

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	Civil Action No. 04-10294-DPW
IN RE SONUS NETWORKS, INC.)	(Lead Case)
SECURITIES LITIGATION)	
_____)	
THIS DOCUMENT RELATES TO:)	
ALL CASES)	
_____)	

**LEAD PLAINTIFF'S NOTICE OF MOTION
AND UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF THE CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated as of December 21, 2007 (the "Stipulation"), lodged herewith, and upon the accompanying memorandum of law and all of the prior pleadings and papers in this action, Lead Plaintiff hereby moves this Court, on January 15, 2008 at 3:00 p.m. before the Honorable Douglas P. Woodlock in the United States Courthouse for the District of Massachusetts, 1 Courthouse Way, Courtroom No. 1, Boston, Massachusetts 02210, for entry of an order providing for the following:

- (a) preliminarily approving the proposed settlement with the Settling Defendants as defined in the Stipulation;
- (b) approving the form and program of Class notice described in the Stipulation; and
- (c) scheduling a final fairness hearing to determine whether the proposed settlement should be finally approved, whether the proposed Plan of Allocation of Settlement Proceeds should be approved, and considering Lead Plaintiff's counsel's application for attorney's fees and reimbursement of expenses.

This motion is made on grounds that the requirements of Rule 23(e) of the Federal Rules of Civil Procedure are satisfied. Accordingly, Lead Plaintiff respectfully requests that the Court enter the [Proposed] Preliminary Order In Connection With Settlement Proceedings, lodged herewith.

Dated: December 21, 2007

GOLD BENNETT CERA & SIDENER LLP

By: /s/Solomon B. Cera
Solomon B. Cera

Attorneys for Lead Plaintiff
BPI Global Asset Management LLP